

MEMO

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FROM: Karen Jackson Sismour

SUBJECT: Modified Solid Waste Annual Report Procedure
Guidance Number SW 01-2003

DATE: March 10, 2003

Attached is the modified solid waste groundwater annual report procedure. It is designed to improve coordination between the Office of Waste Permitting Groundwater (GW) Staff and the Regional Offices (RO) and better define the duties of each group.

The ROs will receive the GW Annual Reports and enter the date into CEDS. The ROs will take appropriate action to bring the facilities that did not submit an annual report into compliance. The GW staff will complete the technical evaluations (including the completeness reviews) by August 1.

If you have any questions on these procedures, please contact Howard Freeland at 804-698-4219.

Solid Waste Annual Report Receipt and Evaluation

To ensure that the Solid Waste Annual Groundwater Monitoring Reports are received, logged into CEDs, and evaluated in an efficient manner, the following procedure shall be used. It should be noted that this procedure supercedes all previous procedures.

Regional Offices (ROs)

1. Receive the Annual Groundwater Monitoring Report (AR) from the solid waste facilities by March 1.
2. Log the receipt date into CEDs. From Solid Waste Permits Application (Module), query the appropriate facility using the SWP permit number. Pick the Events Tab and enter the date received into the AGWRCV field in the Date Completed Column.
3. Notify facilities that did not submit an AR by March 1 and take appropriate action to bring those facilities into compliance. The ROs will send a warning letter or contact the facility and issue a Notice of Violation if the annual report has not been received by April 1.
4. The ROs shall have until April 1 to transmit any RO reviews, as necessary, to the GM. For example, the RO may use this opportunity to verify that facilities are conducting groundwater monitoring in accordance with the appropriate program.

Groundwater Staff

1. Conduct the completeness and technical evaluation of the AR, taking into account any prioritization provided by the ROs and any comments made by the RO.
2. Send the technical review comments to the facility and copy the Waste Compliance Manager (Deputy Regional Director for SWRO).
3. Technically evaluate all ARs by August 1.
4. Follow up with correspondence or other contact, as necessary, until the AR is technically adequate.

Note: It is preferred that the facilities submit an annual report both to the RO and the GM. However, it is expected that some annual reports will be received by either the RO or the GM without the other being copied. In that situation and if the GM receives the annual report (AR), then a copy of the AR will be sent to the RO. The original AR will be sent to the GM if he has not received the AR or only one copy was submitted to the DEQ. The CO groundwater files are the official repository and an original AR should be in those file.